

•

) CIVIL ACTION

:

:

;

2

;

1

1

人

4

4

1

;

No. 02-W-3216

(

)

1

1

)

)

1

**Defendants.**

## PRELIMINARY INJUNCTION

AND NOW, this \_\_\_\_ day of \_\_\_\_, 2002, after due consideration of Plaintiff's

The Court makes the following findings:

a. There is a likelihood that Plaintiff will succeed on the merits of its

claims that Defendants have committed unlawful conduct and that such conduct will continue unless restrained:

b. Substantial and irreparable injury to Plaintiff and to the public at large will result unless this Order is entered;

c. As to each item of relief granted below, greater injury will be inflicted upon Plaintiff by the denial of relief than will be inflicted upon Defendants by the granting of relief;

d. Plaintiff has no adequate remedy at law; and

e. The public interest will be served by the injunction.

2. A Preliminary Injunction be and hereby is issued, as provided under Rule 65 of the Federal Rules of Civil Procedure.

3. Defendants, together with their representatives, agents, servants, and all others acting on its behalf or in concert with them, be and hereby are ENJOINED and RESTRAINED FROM:

Using or disclosing, for any purpose whatsoever, any of the confidential and proprietary information provided to Reebok by Majestic; and

Competing with Majestic to acquire any Major League Baseball licenses during the pendency of this action and until the final adjudication of Plaintiff's request for permanent injunctive relief.

It is further ORDERED that

Reebok must return all confidential and proprietary information provided to it by Majestic, including any copies of such information stored in any form whatsoever.

BY THE COURT:

\_\_\_\_\_.J.

MAJESTIC ATHLETIC LTD.,  
a Pennsylvania corporation,

CIVIL ACTION

No. 02 W- 3216

REEBOK INTERNATIONAL LTD.,  
a Massachusetts corporation, and  
PAUL FIREMAN, a Massachusetts citizen,  
individually and in his  
capacity as Chairman, CEO and President of  
Reebok International Ltd.,

Defendants.

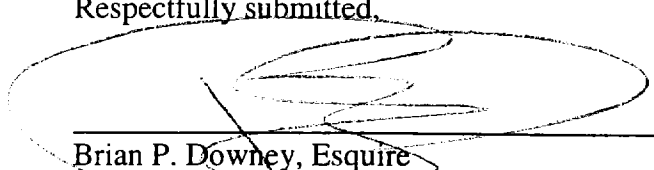
Plaintiff hereby moves, pursuant to Rule 65 of the Federal Rules of Civil Procedure, for a Preliminary Injunction after hearing. Plaintiff requests that this Court enter a preliminary injunction as more fully described herein.

This Motion is based on Plaintiff's Complaint, and any other evidence that has been or may be made part of the record in this matter.

Plaintiff requests a hearing and/or oral argument.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order substantially in the form attached hereto.

Respectfully submitted,



---

Brian P. Downey, Esquire  
Alexandra Makosky, Esquire  
PEPPER HAMILTON LLP  
200 One Keystone Plaza  
North Front and Market Streets  
P.O. Box 1181  
Harrisburg, PA 17108-1181  
(717) 255-1155

George M. Medved, Esquire  
Kim M. Watterson, Esquire  
PEPPER HAMILTON LLP  
50th Floor  
500 Grant Street  
Pittsburgh, PA 15219-2502  
(412) 454-5000

Dated: May 24, 2002

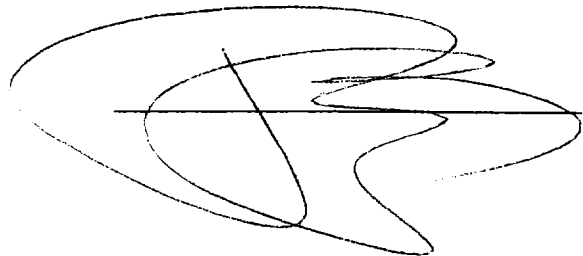
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served this 24<sup>th</sup> day of May, 2002, via first class U.S. Mail, postage prepaid, upon the following:

Reebok International, Ltd.  
1895 J.W. Foster Boulevard  
Canton, MA 02021

Reebok International, Ltd.  
c/o CT Corporation System  
1515 Market Street, Suite 1210  
Philadelphia, PA 19102

Mr. Paul Fireman  
c/o Reebok International, Ltd.  
1895 J.W. Foster Boulevard  
Canton, MA 02021

A handwritten signature in black ink, appearing to be 'P. Fireman', written over a horizontal line.